

D/F  
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October 15, 2018

BY ECF

Honorable Nicholas G. Garaufis  
United States District Judge  
United States Courthouse  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: *United States v. Allison Mack,*  
18 Cr. 204 (NGG)

Dear Judge Garaufis:

We write respectfully on behalf of our client, Allison Mack, to request a modification of the conditions of her release.

Specifically, we respectfully request that the Court amend the home detention component of her conditions to permit Ms. Mack to leave her residence for up to three hours per week—with the specific days and times to be scheduled regularly and pre-approved by Pretrial Services—for “errand time,” i.e., to purchase groceries, supplies, and other necessities. If Your Honor so approves, Ms. Mack will provide Pretrial Services proof of errand (e.g., a shopping receipt) each

Hon. Nicholas G. Garaufis, U.S.D.J.

October 15, 2018

Page 2

time she leaves her residence for purposes of an errand pursuant to this requested modification.

We have conferred with Pretrial Services and the government, who both consent to the proposed amendment.

Respectfully yours,

/s/

William F. McGovern  
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cc: AUSA Moira Kim Penza (by ECF)  
AUSA Tanya Hajjar (by ECF)  
Pretrial Services Officer Anna Lee (by email)  
Pretrial Services Officer Elizabeth Brassell (by email)  
Pretrial Services Officer Brenda Mercado (by email)

Application granted.  
so ordered.  
s/Nicholas G. Garaufis  
10/15/18